

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)
) Chapter 11
LINQTO TEXAS, LLC, *et al.*,¹)
) Case No. 25-90186
Debtors.)
) (Joint Administered)
)

**DEBTORS' AMENDED AGENDA OF MATTERS SET FOR VIRTUAL HEARING
ON AUGUST 5, 2025 AT 1:00 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) file this Agenda of Matters Set for Virtual Hearing on August 5, 2025, at 1:00 p.m. (prevailing Central Time) before the Honorable Alfredo R. Pérez in the United States Bankruptcy Court for the Southern District of Texas:

A. Evidentiary Support.

- a. Stipulation of Uncontested Facts Concerning Emergency Motion to Transfer Venue [Docket No. 174].
- b. *Declaration of Jeffrey S. Stein in Support of Debtors' Opposition to the Emergency Motion of Sapien Group USA, LLC and its Group Affiliates to Transfer Venue of the Debtors' Cases to the District of Delaware Pursuant to 28 U.S.C. § 1412* [Docket No. 173-1].
- c. Witness and Exhibit List [Docket No. 161] and exhibits contained therein [Docket Nos. 161-1 through 161-27].

B. Second Day Pleadings.

1. **Rejection Motion:** *Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases and (B) Abandon Certain Personal Property, If Any, Effective as of the Rejection Date, and (II) Granting Related Relief* [Docket No.81].

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Linqto, Inc. [0332]; Linqto Liquidshares, LLC [8976]; Linqto Liquidshares Manager, LLC [8214]; and Linqto Texas, LLC [5745]. The location of the Debtors' service address is: 101 Metro Drive, Suite 335, San Jose, CA 95110.

Status: This matter is uncontested and the Debtors intend to file a Certificate of No Opposition in advance of the 8/5 hearing.

2. **OCP Motion:** *Motion for Entry of an Order (I) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 82].

Status: The Debtors received certain informal comments to this pleading and intend to file a Certificate of Counsel in advance of the 8/5 hearing.

3. **Cash Management Motion:** *Emergency Motion for Entry of Interim and Final Orders Authorizing the Debtors to: (I) Continue to Operate their Cash Management System and Maintain Existing Bank Accounts, (II) Continue to Perform Intercompany Transactions, and (III) Maintain Existing Business Forms* [Docket No. 7].

Status: The Debtors received certain informal comments to this pleading and intend to file a Certificate of Counsel in advance of the 8/5 hearing.

4. **Interim Compensation Motion:** *Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 77].

Status: The Debtors received certain informal comments to this pleading and intend to file a Certificate of Counsel in advance of the 8/5 hearing.

5. **Transfer Venue Motion:** *Emergency Motion to Transfer Venue of the Debtors' Cases* [Docket No. 88].

Status: This matter is going forward.

Dated: August 4, 2025
Houston, Texas

Respectfully submitted,

SCHWARTZ PLLC

/s/ Veronica A. Polnick

Gabrielle A. Hamm (TX Bar No. 24041047)
Veronica A. Polnick (TX Bar No. 24079148)
Renee D. Wells (TX Bar No. 24013731)
Athanasios E. Agelakopoulos (*pro hac vice*)
440 Louisiana Street, Suite 1055
Houston, Texas 77002
Telephone: (713) 900-3737
Facsimile: (702) 442-9887
Email: ghamm@nvfirm.com
vpolnick@nvfirm.com
rwellss@nvfirm.com
aagelakopoulos@nvfirm.com

Samuel A. Schwartz (*pro hac vice*)
601 East Bridger Avenue
Las Vegas, Nevada 89101
Telephone: (702) 385-5544
Facsimile: (702) 442-9887
Email: saschwarz@nvfirm.com

Proposed Counsel for the Debtors and Debtors in Possession

Certificate of Service

I certify that on August 4, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Veronica A. Polnick*
Veronica A. Polnick